

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)

**PLAINTIFFS' NOTICE OF *DAUBERT* MOTION TO PRECLUDE
OPINIONS OF DEFENSE EXPERT JOHN FLACK, M.D., M.P.H.**

TO: Jessica Davidson, Esq,
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Manhattan West
New York, New York 10001
Attorneys for Defendants

PLEASE TAKE NOTICE that pursuant to MDL Text Order 2271, Plaintiffs shall move before the Honorable Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master, at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order Precluding the Opinions of Defense Expert John Flack, M.D., M.P.H..

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the Brief and Certification of Daniel A. Nigh in support of the Motion.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

**NIGH GOLDENBERG RASO & VAUGHN,
PLLC**
Attorneys for Plaintiffs

By: /s/ Daniel A. Nigh

Dated: March 13, 2023

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2023, I electronically filed a partially redacted version of the foregoing documents with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that unredacted copies of foregoing document will be served contemporaneous to filing via email on the Court, Special Master, and the Defense Executive Committee at DECValsartan@btlaw.com.

**NIGH GOLDENBERG RASO & VAUGHN,
PLLC**

Attorneys for Plaintiffs

By: /s/ Daniel A. Nigh

Dated: March 13, 2023